

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

In the Matter of O.T.)
)
ZUHTU ONUR TATARI)
)
Petitioner,)
)
vs.)
)
NEVA DURUST)
)
Respondent.)
)

Case No. 1:24-cv-06930-CBA-SJB

CONSENT ORDER

The Convention on the Civil Aspects of International Child Abduction, done at The Hague on October 25, 1980; International Child Abduction Remedies Act, 22 U.S.C. 9001 et seq.

This Consent Order is made pursuant to of the 1980 Convention on the Civil Aspects of International Child Abduction (the “Hague Convention”) and the International Child Abduction Remedies Act (“ICARA”), 22 U.S.C. § 9001 *et seq.*, and with the express consent and agreement of both parties, as evidenced by the signatures of their respective counsel. It is therefore this ____ day of _____, 2024, by the United States District Court for the Eastern District of New York, hereby:

1. **ORDERED** that Respondent, or any person acting in concert or participation with Respondent, is prohibited from removing the Child, O.T., born in 2018, from the State of New York absent further approval of this Court based on good cause shown; and it is further
2. **ORDERED** that Respondent shall immediately deposit with the Clerk of the Court, to the extent not already deposited, any and all passports in her possession, including expired passports, or other travel documents, in the name of O.T., including those issued in the United States and Turkey, which shall be held for safekeeping by the Court.

IT IS SO ORDERED this _____ day of _____, 2024.

United States District Judge
United States District Court
for the Eastern District of New York

APPROVED AS TO FORM AND CONTENT:

Brett S. Ward

Brett Ward
Marilyn Chinitz
Blank Rome LLP
1271 Avenue of the Americas
New York, New York 10020
(212) 855-5392
brett.ward@blankrome.com
marilyn.chinitz@blankrome.com

Attorneys for Respondent

Richard Min

Richard Min
Green Kaminer Min & Rockmore LLP
420 Lexington Ave. Ste. 2821
New York, New York 10170
(212) 681-6400
rmin@gkmrlaw.com

Attorneys for Petitioner